

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In Re: JOAN M. KNEPP

Debtor(s)

JACK N. ZAHAROPOULOS  
CHAPTER 13 TRUSTEE  
Movant

vs.  
JOAN M. KNEPP

CHAPTER 13

CASE NO: 1-24-02551-HWV

Respondent(s)

**TRUSTEE'S MOTION TO DISMISS CASE**

AND NOW, on February 28, 2025, Jack N. Zaharopoulos, Standing Chapter 13 Trustee for the Middle District of Pennsylvania, through his attorney, Douglas R. Roeder, Esquire, and moves this Honorable Court for dismissal of the above-captioned Chapter 13 bankruptcy case in accordance with 11 U.S.C. Section 1307(c), due to bad faith and non-payment. The Debtor also failed to appear at her Meeting of Creditors on February 27, 2025.

Section 1325(a)(1) unequivocally provides for plan payments to begin within 30 days of the filing of the petition. Here, the Debtor's plan proposes for \$0 monthly payments to be made to the Trustee and then a large lump sum to be paid by December 2025 (i.e., a year after the filing date). The Debtor's proposal runs contrary to the Code and is not in good faith.

Notice of hearing and other instructions are included with this Motion.

WHEREFORE, your Trustee prays that this Honorable Court enter an Order dismissing the above-captioned case in accordance with 11 U.S.C. Section 1307(c).

Respectfully submitted,

/s/ Douglas R. Roeder, Esquire  
ID: 80016  
Attorney for Trustee  
Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
Suite A, 8125 Adams Drive  
Hummelstown, PA 17036  
Phone: (717) 566-6097  
email: droeder@pamd13trustee.com

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**NOTICE**

NOTICE IS HEREBY GIVEN that Jack N. Zaharopoulos, Standing Chapter 13 Trustee for the Middle District of Pennsylvania, has filed a Motion to Dismiss for bad faith, non-payment and failure to appear at her Meeting of Creditors.

If you object to the relief requested, you must file your objection/response on or before March 14, 2025, with the Clerk of Bankruptcy Court:

Sylvia H. Rambo United States Courthouse  
Bankruptcy Courtroom 4B, 4th Floor  
1501 North 6th Street  
Harrisburg, PA 17102

and serve a copy on the Chapter 13 Trustee for the Middle District of Pennsylvania:

Jack N. Zaharopoulos  
Office of the Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036.

A hearing with the Court has been scheduled on this motion and will be held regardless of any objections or responses having been filed:

Sylvia H. Rambo United States Courthouse  
Bankruptcy Courtroom 4B, 4th Floor  
1501 North 6th Street  
Harrisburg, PA 17102

Date: April 2, 2025  
Time: 9:35 AM

Dated: February 28, 2025

Respectfully submitted,

/s/ Douglas R. Roeder, Esquire  
ID: 80016  
Attorney for Trustee  
Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
Suite A, 8125 Adams Drive  
Hummelstown, PA 17036  
Phone: (717) 566-6097  
email: info@pamd13trustee.com

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**CERTIFICATE OF SERVICE**

I certify that I am more than 18 years of age and that on February 28, 2025, I served a copy of this Motion to Dismiss, Notice and Proposed Order on the following parties from Hummelstown, PA, unless served electronically.

Served Electronically

JOHN M HYAMS ESQUIRE  
2023 N 2ND STREET, SUITE 203  
HARRISBURG PA 17102-

UNITED STATES TRUSTEE  
1501 NORTH 6<sup>TH</sup> STREET  
PO BOX 302  
HARRISBURG PA 17102

Served by First Class Mail

JOAN M. KNEPP  
1430 VIRGINIA AVE.  
YORK PA 17403

I certify under penalty of perjury that the foregoing is true and correct.

Date: February 28, 2025

/s/ Derek M. Strouphauer, Paralegal  
Office of the Standing Chapter 13 Trustee  
Jack N. Zaharopoulos  
Suite A, 8125 Adams Dr.  
Hummelstown, PA 17036  
Phone: (717) 566-6097  
email: [info@pAMD13trustee.com](mailto:info@pAMD13trustee.com)

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vs.

JOAN M. KNEPP

**ORDER DISMISSING CASE**

Upon consideration of the Trustee's Motion to Dismiss, it is hereby Ordered that the above-captioned bankruptcy be and hereby is dismissed. The Court retains jurisdiction to rule on any timely filed fee application.